

MEMO ENDORSED LEWIS & LIN LLC

77 SANDS STREET, 6TH FLOOR
BROOKLYN, NY 11201
TEL: (718) 243-9323 FAX: (718) 243-9326
WWW.ILAWCO.COM

PARTNERS

Brett E. Lewis
David D. Lin

SENIOR COUNSEL

Nicole Haff

OF COUNSEL

Eric Belanger
Roberto Ledesma

COUNSEL

Michael D. Cilento
Jane J. Jaang

ASSOCIATES

Anna Iskikian
Rachel Ann Niedzwiedek
Savita Sivakumar
Shuyu Wang

Michael D. Cilento, Esq.
michael@ilawco.com
347-404-5844

March 3, 2025

Via ECF

Hon. Victoria Reznik
United States Magistrate Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
No. 7:13-cv-09239-CS-VR**

Dear Judge Reznik:

We write on behalf of the Plaintiff, The Wave Studio, LLC (“Wave”), to respectfully request a brief extension of time to file opposition papers to Defendants’ motions to dismiss and Wave’s cross-motion for leave to amend the master complaint.

Our firm was very recently retained to represent Wave, and the Notice of Substitution, which awaits Your Honor’s signature, was filed this past Friday. *See* ECF 437. Wave’s previous counsel, Robins Kaplan LLP, is currently processing the transfer of the case file to our office. Given this recent transition and the volume of the case file and data in this matter, we respectfully submit that good cause exists to allow for the brief extension, so that my office can thoroughly review the case materials and prepare opposition papers that will properly address the substantive issues raised in Defendants’ motions, and to prepare Wave’s cross motion.

The current briefing schedule, as set forth in ECF 434, is as follows:

March 14, 2025 - Deadline for Plaintiff's opposition to the motions to dismiss and its cross-motion for leave to amend the master complaint

LEWIS & LIN LLC

April 11, 2025 - Deadline for Defendants' reply papers on motions to dismiss and their opposition to the cross-motion for leave to amend

April 25, 2025 - Deadline for Plaintiff's reply papers for the cross-motion for leave to amend the master complaint

April 28, 2025 - Deadline for parties to file all motion papers on the docket

We have conferred with counsel for the Defendants who have filed the motions to dismiss¹ – and they have consented to a 28-day extension as set forth below:

April 11, 2025 - Deadline for Plaintiff's opposition to the motions to dismiss and its cross-motion for leave to amend the master complaint

May 9, 2025 - Deadline for Defendants' reply papers on motions to dismiss and their opposition to the cross-motion for leave to amend

May 23, 2025 - Deadline for Plaintiff's reply papers for the cross-motion for leave to amend the master complaint

May 27, 2025 - Deadline for parties to file all motion papers on the docket (as May 26, 2025 is Memorial Day)

The extension would not affect any other parties and would not impact any other deadlines or aspects of the case.

We appreciate the Court's consideration of this matter and remain available should the Court require any additional information.

Respectfully submitted,

Michael Cilento
Michael D. Cilento

Plaintiff's request is **GRANTED**, and the revised briefing schedule listed above is adopted. The Clerk of Court is respectfully directed to close the gavel associated with ECF No. 438.

SO ORDERED.

Hon. Victoria Reznik, U.S.M.J.

Dated: 3/4/2025

¹ The “*Booking Defendants*,” consisting of Booking Holdings, Inc., Agoda Company Pte. Ltd., AGIP LLC, Booking.com BV, Booking.com (USA) Inc., Rocket Travel, Inc., Momondo A/S, Priceline.com LLC, Hotel Combined LLC, and Southwest Airlines Co.; the “*Trip Defendants*,” consisting of Trip.com Group Limited, Trip.com Travel Singapore Pte. Ltd, and MakeMyTrip, Inc.; and “*Qatar Airways*,” Qatar Airways Q.C.S.C.